



USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 6/17/25

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 Church Street  
NEW YORK, NY 10007

MURIEL GOODE-TRUFANT  
*Corporation Counsel*

JOSEPH ZANGRILLI  
Phone: (212) 356-2657  
Fax: (212) 356-3509  
jzangril@law.nyc.gov  
*Senior Counsel*

Application GRANTED. SO ORDERED.

June 16, 2025

**BY ECF**

Honorable Barbara C. Moses  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Barbara Moses  
United States Magistrate Judge  
June 17, 2025

Re: Peter Rodriguez v. City of New York, et al.,  
20 Civ. 9840 (JHR) (BCM)

Your Honor:

I am a Senior Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and the attorney representing Defendants Gibson, Moise, Galuzevskiy, Williams, Ferrero, and the City of New York in the above referenced matter.<sup>1</sup> Pursuant to Rule 2.a. of Your Honor's Individual Practices in Civil Cases, Defendants respectfully request an extension of time to file their reply brief for summary judgment from June 23, 2025 until July 3, 2025. This is the Defendants' first request for an extension of time to file their reply brief. This extension is necessary because ACC John McLaughlin, who is handling this matter under my supervision, is out of the office attending a mandatory civil trial advocacy training from June 16 through June 23, 2025, that runs from 9:00 AM until 5:00 PM. Additionally, this extension request was deferred to obtain Plaintiff's position on the earliest date available at the Auburn Correctional Facility. Plaintiff does not consent to this request, as he believes this litigation has been delayed too long already.

By way of background, Defendants served Plaintiff their motion for summary judgment on December 29, 2022. Plaintiff's original deadline to oppose Defendants' motion was February 28, 2023. The Court recently held a telephonic status conference on April 8, 2025, to address issues regarding Plaintiff's access to discovery materials and set June 9, 2025 as Plaintiff's

<sup>1</sup> This case has been assigned to Assistant Corporation Counsel John McLaughlin, who is presently awaiting admission to the Southern District of New York and is handling this matter under my supervision. Mr. McLaughlin may be reached directly at (212) 356-2670 or by email at jmclaugh@law.nyc.gov

deadline to respond to the summary judgment motion. Plaintiff, with the assistance of Cravath, Swaine & Moore LLP, filed his opposition on or about June 9, 2025. Cravath appeared pro bono for purposes of the opposition only, and is no longer representing Plaintiff in this matter. As previously mentioned, Defendants' reply is currently due June 23, 2025.

Given the complexity of this matter and the need to ensure a thorough response to Plaintiff's opposition, Defendants respectfully request this short extension. Upon information and belief, this extension will not affect any other scheduled dates in this litigation.

The Defendants thank the Court for its time and consideration of this request.

Respectfully Submitted,

*Joseph Zangrilli /s/*

Joseph Zangrilli  
Attorney for Defendants City,  
Gibson, Moise, Galuzevskiy,  
Williams, and Ferrero  
*Senior Counsel*  
New York City Law Department  
100 Church Street  
New York, NY 10007  
(212) 356-2657  
jzangril@law.nyc.gov

Cc: **VIA FIRST CLASS MAIL**  
Peter Rodriguez  
#22-B-2287  
Auburn Correctional Facility  
P.O. Box 618  
Auburn, NY 13024  
*Plaintiff Pro Se*